



The Ozark Society

PO Box 166

Fayetteville, AR 72702

To: District Ranger
P.O. Box 189
Jessieville, AR 71949

RE: US Forest Service, Ouachita National Forest – Project 63480 Mining Nominations Jessieville, Winona, Fourche

<https://www.fs.usda.gov/r08/ouachita/projects/63480>

After carefully reviewing the 3 options presented in EA 63480 – Mining Nominations Jessieville, Winona, Fourche, the Ozark Society supports the **No Action** option as the best for the health of the Ouachita National Forest, the water quality of the areas proposed, and the flora and fauna of the affected environment. We have determine that the other 2 options, a.) the Proposed Action of mining 337 acres on 8 tracts, and b). Alternative A of mining 207 acres on 7 tracts, will degrade the overall environment and cause severe risk to critical water systems in large portions of the state.

For the Proposed Action:

There are 8 tracts in 3 distinct areas of the forest, 1.) three tracts near Lake Ouachita - tracts OQC-246P, OQC-257P, OQC-287P; 2.) one tract in the headwaters of the Alum Fork just west of Lake Winona - OQC-258P; and 3.) four tracts just east of Lake Winona in the Upper North Fork Saline River area.

1. The Lake Ouachita Tracts:

For the 3 tracts located within the Lake Ouachita watershed, a drinking water source for Hot Springs National Park (city), our main concern is the potential for increased sedimentation and turbidity in the lake. Your own estimates expect the increase in sedimentation for Big Blakey Creek (OQC-287P) of 629% or an increase of 1,688+ additional tons per year and that the risk is HIGH. Tracts OQC-246P and OQC-257P have an estimated increase in sedimentation of 699% or an increase in 1,539 additional tons per year. While the risk assessment is lower on those 2 tracts, it is still a serious concern given recent years with unseasonable patterns of rainfall.

2. The Headwaters Alum Fork or Lake Winona watershed tract (not in option Alternative A):

Tract OQC-258P (also referred to in some project documents as OQC-179 with the same Lat/Long: Lat. 34.834N, Long. -92.935W) is probably the most concerning tract of all in the Proposed Action and your own concern for it may be why it is not in option Alternative A. This

is an expansion of 2 old abandon mines GN-01 and GN-02. However, the expansion includes the Stillhouse Creek area, a tributary to Alum Fork within the Lake Winona watershed. This lake provides 30+% of all drinking water to Little Rock and North Little Rock. Your increased sedimentation estimates for this tract are an additional 825% or an increase in 897 tons per year! As your EA states: "CAW and DEQ monitor Maximum Daily Loads (as determined by the EPA) and are required to adhere to EPA's Clean Water Act and other regulations, as much of the Saline River drainage, including the Alum Fork, is designated as an Extraordinary Resource Water." Mining in the Lake Winona watershed should never be seriously considered as long as this remains a drinking water source and such a critical resource for the state.

3. The Upper North Fork Saline River Tracts:

The tracts east of Lake Winona in the Upper Saline River watershed are OQC-259P, OQC-293P, OQC-294P, and OQC-295P and it is noteworthy that the four forks of the Saline River are considered by the Arkansas Department of Energy and Environment (ADEE) to be an ecologically sensitive waterbody. Based on estimates from the Proposed Action, increased sedimentation for these 4 tracts would be 1335% or an increase in 2,199 tons per year! Also, according to surveys in the area, the Central Arkansas Water (CAW) Lake Winona raw water pipe is under or adjacent to OQC-259P. Breakage of this pipe would create a water emergency for over 100,000 people in our state's largest urban area; Little Rock/North Little rock.

For Alternative A:

Alternative A eliminates Tract OQC-258P from the nomination and restricts some mining in the other 7 tracts to a total of 207 acres. All the same objections in #1 and #3 above still apply even if the sedimentation rates are ever so slightly less onerous and the Ozark Society still opposes those options and supports **No Action**.

In General:

While our current focus is primarily on the water quality issues presented in this EA 63480, there are numerous other overall concerns for habitat of endangered species, for potential mine abandonment and lack of remediation, for protection of special natural areas on the Saline River, for the viewshed and trail experiences in the Ouachitas and Saline County, for tourism degradations, and for how long leases can be extended. Those issues bare serious consideration as well in determining which option this EA approves for implementation.

The Ozark Society Board

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